

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JOSE CRESPO,

Case No.: 1:22-cv- 06599-JPO

Plaintiff,

-against-

**GUTMAN, MINTZ, BAKER & SONNENFELDT, LLP,
GARY THIGPEN, ERIC KEILBACH, and
1511 SHERIDAN LLC,**

Defendants.

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STIPULATION ON DISCOVERY

In order to streamline discovery and minimize disputes, Plaintiff and Defendants Gutman, Mintz, Baker & Sonnenfeldt, LLP (“GMBS”), Gary Thigpen, and Eric Keilbach (collectively the “Gutman Defendants”) enter into the following Stipulation:

1. Defendants will supplement their discovery answers and document production as per the agreements counsel made in their email exchanges from January 6, 2021 through 5:00 PM January 12, 2021 by no later than 2:30 PM on January 13, 2023. Defendants will provide the information on a rolling basis and will in good faith attempt to provide the information as soon as possible, especially as to the discovery issues related to any property management companies.
2. Based upon the resolution of certain discovery disputes concerning information related to property management companies, which would be the potential additional defendants for which Plaintiff may seek amendment of the Complaint (Dkt. No. 1), the parties jointly request that the deadline to move to amend be extended by one week from January 13, 2023 to January 20, 2023.

AGREED:

/s/ Ken Novikoff

Ken Novikoff
Rivkin Radler

Date: 01/11/2023

Attorneys for Defendants Gutman, Mintz, Baker & Sonnenfeldt, LLP, Gary Thigpen, and Eric Keilbach

AGREED:

/s/ Ahmad Keshavarz

Ahmad Keshavarz
Law Office of Ahmad Keshavarz
One of the Attorneys for Plaintiff Jose Crespo

Date: 01/11/2023

AGREED: /s/ Susan Shin

Susan Shin
New Economy Project
One of the Attorneys for Plaintiff Jose Crespo

Date: 01/11/2023

SO ORDERED this 12th **day of** January, **2023.**



J. PAUL OETKEN
United States District Judge